

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

**DAEBO INTERNATIONAL SHIPPING
CO. LTD.,**

Debtor in a Foreign Proceeding

Chapter 15

Case No. 15-10616 (MEW)

**STIPULATION ESTABLISHING FORBEARANCE PERIOD
REGARDING ORDER ON MOTION TO VACATE AND SETTING
BRIEFING SCHEDULE**

WHEREAS, on December 15, 2015, this Court entered an opinion and order granting the motion of Chang-Jung Kim, the custodian and foreign representative (the "Foreign Representative") of Daebo International Shipping Co., Ltd. to vacate certain maritime attachments (the "Attachments") [D.E. 75 & 76] (the "Vacatur Order"); and

WHEREAS Richardson Stevedoring & Logistics Services, Inc. ("Richardson") and SPV I LLC ("SPV") (collectively, the "Rule B Creditors") are considering an appeal of the Vacatur Order and, in connection therewith, seeking a stay pending appeal; and

WHEREAS the Foreign Representative and the Rule B Creditors wish to avoid emergency motion practice in connection therewith.

IT IS HEREBY STIPULATED AND AGREED THAT, unless otherwise ordered by this Court or agreed to by the parties, the Attachments shall remain in effect until: (i) January 6, 2016, or (ii) if the Rule B Creditors file a motion for a stay of the Vacatur Order by January 6, 2016, the date upon which such motion is decided by this Court (the "Forbearance Period"); and


IT IS FURTHER STIPULATED AND AGREED that, during the Forbearance Period, the Foreign Representative shall take no action to enforce the Vacatur Order against the Rule B Creditors, unless otherwise ordered by this Court or agreed to by the parties; and

IT IS FURTHER STIPULATED AND AGREED that the due date for the Rule B Creditors' brief in support of the stay pending appeal shall be due on January 6, 2016; and

IT IS FURTHER STIPULATED AND AGREED that the due date for the Foreign Representative's opposition papers, if any shall be January 20, 2016; and

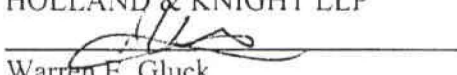
IT IS FURTHER STIPULATED AND AGREED that the due date for the Rule B Creditors' reply papers, if any, shall be January 27, 2016.

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